

## UNITED STATES DISTRICT COURT

for the

District of Indiana

Division

**FILED****04/18/2024**

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
Roger A.G. Sharpe, Clerk

Case No. 1:24-cv-00692-SEB-MG  
(to be filled in by the Clerk's Office)

Elesha A Storey

*Plaintiff(s)*

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one)  Yes  No

CNO Financial Group

*Defendant(s)*

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**COMPLAINT FOR EMPLOYMENT DISCRIMINATION****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

|                    |                          |
|--------------------|--------------------------|
| Name               | Elesha A Storey          |
| Street Address     | 609 Cedarwood Street     |
| City and County    | Aubrey and Denton County |
| State and Zip Code | Texas 76227              |
| Telephone Number   | 214-417-6199             |
| E-mail Address     | storeyelesha@gmail.com   |

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

|                                    |                            |
|------------------------------------|----------------------------|
| Name                               | CNO Financial Group        |
| Job or Title ( <i>if known</i> )   |                            |
| Street Address                     | 11299 Illinois Street      |
| City and County                    | Carmel and Hamilton County |
| State and Zip Code                 | Indiana 46032              |
| Telephone Number                   |                            |
| E-mail Address ( <i>if known</i> ) |                            |

## Defendant No. 2

|                                    |  |
|------------------------------------|--|
| Name                               |  |
| Job or Title ( <i>if known</i> )   |  |
| Street Address                     |  |
| City and County                    |  |
| State and Zip Code                 |  |
| Telephone Number                   |  |
| E-mail Address ( <i>if known</i> ) |  |

## Defendant No. 3

|                                    |  |
|------------------------------------|--|
| Name                               |  |
| Job or Title ( <i>if known</i> )   |  |
| Street Address                     |  |
| City and County                    |  |
| State and Zip Code                 |  |
| Telephone Number                   |  |
| E-mail Address ( <i>if known</i> ) |  |

## Defendant No. 4

|                                  |  |
|----------------------------------|--|
| Name                             |  |
| Job or Title ( <i>if known</i> ) |  |
| Street Address                   |  |
| City and County                  |  |
| State and Zip Code               |  |

Telephone Number \_\_\_\_\_  
 E-mail Address (*if known*) \_\_\_\_\_

### C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

|                    |                            |
|--------------------|----------------------------|
| Name               | CNO Finanacial             |
| Street Address     | 11825 Pennsylvania Street  |
| City and County    | Carmel and Hamilton County |
| State and Zip Code | Indiana 46032              |
| Telephone Number   | _____                      |

### II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (*check all that apply*):

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

Other federal law (*specify the federal law*):

42USCSection1981

Relevant state law (*specify, if known*):

Indiana Civil Rights Laws

Relevant city or county law (*specify, if known*):

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

- Failure to hire me.
- Termination of my employment.
- Failure to promote me.
- Failure to accommodate my disability.
- Unequal terms and conditions of my employment.
- Retaliation.
- Other acts (*specify*): \_\_\_\_\_

*(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)*

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)  
02/06/2023

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C. I believe that defendant(s) (*check one*):

- is/are still committing these acts against me.
- is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

|                                     |                                    |                             |   |
|-------------------------------------|------------------------------------|-----------------------------|---|
| <input checked="" type="checkbox"/> | race                               | Black                       | _____   |
| <input type="checkbox"/>            | color                              | _____                       | _____   |
| <input checked="" type="checkbox"/> | gender/sex                         | Female                      | _____   |
| <input type="checkbox"/>            | religion                           | _____                       | _____   |
| <input type="checkbox"/>            | national origin                    | _____                       | _____   |
| <input type="checkbox"/>            | age ( <i>year of birth</i> )       | _____                       | <i>(only when asserting a claim of age discrimination.)</i> |
| <input type="checkbox"/>            | disability or perceived disability | <i>(specify disability)</i> |   |

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E. The facts of my case are as follows. Attach additional pages if needed.

On February 6th, I experienced discrimination based on both my race, Black, and my gender, Female. This discrimination occurred in response to my efforts to reveal the identity of an anonymous Black employee who had shared their opinion or observation concerning a complaint lodged against a primarily Black group of employees. This anonymous individual expressed concerns about job security but wished for their viewpoint to be acknowledged. It is worth noting that CNO Financial offers a platform called Lighthouse for submitting anonymous complaints, statements, and the like. Therefore, there should have been no distinction between utilizing the Lighthouse system and the employee anonymously offering their perspective. EEOC charge attached.

*(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)*

#### IV. Exhaustion of Federal Administrative Remedies

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

02/13/2023

B. The Equal Employment Opportunity Commission *(check one):*

has not issued a Notice of Right to Sue letter.  
 issued a Notice of Right to Sue letter, which I received on (date) 1/20/2024.

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one):*

60 days or more have elapsed.  
 less than 60 days have elapsed.

#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

"I am pursuing compensation for various losses incurred. These include: a bonus for exemplary job performance in 2022, totaling \$15,000; the disparity between the salary increase based on merit (averaging 3%-4%) and the unemployment compensation received over 5 months, amounting to \$20,000; lost wages resulting from a pay reduction by my new employer, totaling \$105,000; the sum of \$15,000 in 401(K) funds lost; and punitive damages due to the adverse impact on my well-being, including stress and other factors, amounting to \$95,000. The total sought is \$250,000."

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## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 4/17/2024

Signature of Plaintiff S/Elesha Storey

Printed Name of Plaintiff Elesha Storey

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_

